

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

<b>JUDICIAL WATCH, INC., et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>1:12-cv-800-WTL-TAB</b>
	)	
<b>J. BRADLEY KING, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' FINAL WITNESS AND EXHIBIT LIST**

The defendants submit their final lists of witnesses and exhibits they may present at trial. The defendants respectfully reserve the right to supplement this list as discovery proceeds until its closure on December 11, 2013.

**Preliminary Witness List:**

1. Trent Deckard, Co-Director, Indiana Election Division
2. J. Bradley King, Co-Director, Indiana Election Division
3. Terrence Coleman, St. Joseph County Voter Registration Board Member
4. Francisco Fotia, St. Joseph County Voter Registration Board Member
5. Sarah Redman, Clerk of the Warrick County Circuit Court
6. Eitan Hersh, Ph.D., 77 Prospect Street, P.O. Box 208209, New Haven CT 06520-8209, (203) 436-9061
7. Karen Handel, the plaintiffs' retained expert.
8. Individuals identified by the defendants as witnesses.
8. Individuals for the purpose of rebuttal.

**Preliminary Exhibit List:**

1. The pleadings in this matter, and all exhibits or attachments.
2. Report of Eitan Hersh, Ph.D., the defendants' expert witness, and documents relied upon and referenced.
3. Report of Karen Handel, the plaintiffs' expert witness.
4. Deposition of Sarah Redman, Warrick County Circuit Court, and all attached exhibits.
5. Deposition of Terrence Coleman, St. Joseph Voter Registration Board Member, and all attached exhibits.
6. Deposition of Francisco Fotia, St. Joseph Voter Registration Board Member, and all attached exhibits.
7. Deposition of Trent Deckard, Indiana Election Division Co-Director, and all attached exhibits.
8. Deposition of J. Bradley King, Indiana Election Division Co-Director, and all attached exhibits.
9. Indiana Election Division Co-Directors interrogatories and responses.
10. Indiana Election Division Co-Directors interrogatories and responses.
11. The plaintiffs' request for admissions and the defendants' responses.
12. The plaintiff True the Vote interrogatory responses.
13. The plaintiff Judicial Watch interrogatory responses.
14. 2012 Election Administration Manual.
15. 2012 Voter Registration Guidebook
16. Standard Operating Procedures of the Indiana Election Division.

17. NVRA training materials of the Indiana Election Division (excerpts).
18. SVRS Core team meeting documents (excerpts).
19. Social Security Administration inquiry letter dated October 3, 2008.
20. Voter list maintenance reminders to counties, e.g. February 27, 2013 letter to County Board of Voter Registration members and Circuit Court Clerks.
21. U.S. Election Assistance Commission Report.
22. NASS Report: Maintenance of State Voter Registration Lists.
23. PEW Center on the States Issues Brief, February 2012.
24. Any and all documents needed for impeachment and/or rebuttal purposes.
25. All documents identified in the plaintiffs' exhibit list.

Respectfully submitted,

GREGORY F. ZOELLER  
Indiana Attorney General  
Attorney No. 1958-98

By: /s/ Jefferson S. Garn  
Jefferson S. Garn  
Deputy Attorney General  
Attorney No. 29921-49

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of September, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to the counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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